

STATEMENT OF BASIS (AI No. 122402)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0124044 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: IMTT-Geismar
Geismar Logistics Center
P.O. Box 138
Geismar, LA 70734-0138

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Yvonne Baker

DATE PREPARED: July 28, 2008

1. PERMIT STATUS**A. Reason For Permit Action:**

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit – NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits – LAG670094
LPDES permit effective date: February 1, 2008
LPDES permit expiration date: January 31, 2013

LAR05N619
LPDES permit effective date: May 25, 2006
LPDES permit expiration date: April 30, 2011

D. Date Application Received: April 1, 2008; additional information received July 22, 2008, July 25, 2008, and August 7, 2008.

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - chemical warehousing and storage facility**

IMTT-Geismar Logistics Center is a chemical warehousing and storage facility which drums and transports chemicals via rail, trucks, pipelines, vessels, and barges. Chemicals are not manufactured at the terminal. Potentially contaminated and/or hazardous solid and liquid waste is sent offsite to hazardous waste treatment, storage, and disposal facilities. All potentially contaminated and contact industrial stormwater runoff, hydrostatic test water, and equipment and vehicle washwater will be sent to BASF for treatment and will discharge through their permitted outfall to the Mississippi River or will be sent to other permitted treatment and disposal facilities. The facility proposes to discharge uncontaminated stormwater runoff, hydrostatic test water, and exterior equipment and vehicle washwater to local drainage thence into Smith Bayou. The treated sanitary wastewater from this facility is discharged to BASF.

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B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4226

C. LOCATION - 8112 Highway 75 in Geismar, Ascension Parish
Latitude 30° 11' 09", Longitude 90° 59' 54"

3. **OUTFALL INFORMATION**

Outfall 001*

Discharge Type: uncontaminated industrial stormwater runoff from rail car storage area, truck and rail transfers, and storage tank area

Treatment: none

Location: at the point of discharge from the Outfall 001 drainage area prior to mixing with waters of the state; (Latitude 30° 10' 59"; Longitude 91° 0' 20")

Flow: intermittent

Discharge Route: via local drainage thence into Smith Bayou

Outfall 002*

Discharge Type: uncontaminated industrial stormwater runoff from rail car storage area, trucking scale, truck and rail transfers, and storage tank area

Treatment: none

Location: at the point of discharge from the Outfall 002 drainage area prior to mixing with waters of the state; (Latitude 30° 11' 05"; Longitude 91° 0' 12")

Flow: intermittent

Discharge Route: via local drainage thence into Smith Bayou

Outfall 003

Discharge Type: uncontaminated industrial stormwater runoff from external tank farm diked area (outside the berm) and truck and rail transfers

Treatment: none

Location: at the point of discharge from the Outfall 003 drainage area prior to mixing with waters of the state; (Latitude 30° 11' 14"; Longitude 90° 59' 56")

Flow: intermittent

Discharge Route: via local drainage thence into Smith Bayou

Outfall 004

Discharge Type: uncontaminated industrial stormwater runoff from external tank farm diked area (outside the berm) and truck and rail transfers

Treatment: none

Location: at the point of discharge from the Outfall 004 drainage area prior to mixing with waters of the state; (Latitude 30° 11' 19"; Longitude 90° 59' 48")

Flow: intermittent

Discharge Route: via local drainage thence into Smith Bayou

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Outfall 005

Discharge Type: uncontaminated industrial stormwater runoff from interior of tank farm diked area (inside the berm)
Treatment: none
Location: at the point of discharge from the Outfall 005 drainage area prior to mixing with waters of the state; (Latitude 30° 11' 19"; Longitude 90° 59' 49")
Flow: intermittent
Discharge Route: via local drainage thence into Smith Bayou

Outfall 006

Discharge Type: hydrostatic test water
Treatment: none
Location: at the point of discharge from testing site prior to mixing with waters of the state
Flow: intermittent
Discharge Route: via local drainage thence into Smith Bayou

Outfall 007

Discharge Type: exterior equipment and vehicle washwater without soaps or detergents
Treatment: none
Location: at the point of discharge from washing activity prior to mixing with waters of the state
Flow: intermittent
Discharge Route: via local drainage thence into Smith Bayou

Outfall 008

Discharge Type: exterior equipment and vehicle washwater with soaps and detergents
Treatment: none
Location: at the point of discharge from washing activity prior to mixing with waters of the state
Flow: intermittent
Discharge Route: via local drainage thence into Smith Bayou

* Outfalls 001 and 002 are currently undeveloped areas of the facility. Each Outfall will be effective upon commencement of operations in the drainage areas for the specific outfall.

NOTE: All potentially contaminated and contact industrial stormwater runoff, hydrostatic test water, and equipment and vehicle washwater will be sent to BASF for treatment and will discharge through their permitted outfall to the Mississippi River or will be sent to other permitted treatment and disposal facilities

4. **RECEIVING WATERS**

STREAM - via local drainage thence into Smith Bayou

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040404

DESIGNATED USES -
a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

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5. TMDL STATUS

Subsegment 040404, New River-From headwaters to New River Canal, is listed on LDEQ's Final 2006 303(d) List as impaired for organic enrichment/low DO and Pathogen Indicators. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the chemical warehousing and storage point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

The discharges from this facility have the potential to discharge pollutants which may contribute to organic enrichment/low dissolved oxygen impairments of the receiving waterbody. The organic enrichment/ low DO impairment shall be addressed through the TOC parameter included in the effluent limitations and monitoring requirements for Outfalls 001, 002, 003, 004, 005, and 006 and the COD parameter included in the effluent limitations and monitoring requirements for Outfalls 007 and 008.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

- A. Outfalls 003, 004, and 005 have numeric limitations with analytical sampling and analysis and SWPPP conditions for individual permits.
- B. The hydrostatic test water (outfall 006) will be encompassed in the permit with the same limitations as the Hydrostatic Test General Permit (LAG670000).
- C. Outfalls 001 and 002 have been included for industrial stormwater from currently undeveloped areas of the facility. Requirements will begin upon commencement of operations in the drainage areas for the specific outfall.
- D. Outfalls 007 and 008 have been included for exterior equipment and vehicle washwater.

7. COMPLIANCE HISTORY/COMMENTS

- A. OEC - There are no open, pending, or appealed enforcement actions as of July 28, 2008.

A routine compliance evaluation inspection was performed on June 12, 2007 and the following observations were noted:

- 1. The facility has a Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activities, which was issued to the facility on 05-01-2006.
- 2. A site tour of the facility grounds was satisfactory.
- 3. The facility has their employee training records.
- 4. The facility has been completing quarterly visual monitoring inspection on their discharges and logging yearly site reviews.
- 5. The facility had its Stormwater Pollution Prevention Plan on site.

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B. DMR Review/Excursions – There was one DMR on file as of July 28, 2008. No excursions of permitted limits were noted.

8. EXISTING EFFLUENT LIMITS

LAR05N619; Sector P

Outfall 003 – uncontaminated industrial stormwater runoff from external tank farm diked area (outside the berm) and truck and rail transfers (estimated flow is intermittent)

Outfall 004 – uncontaminated industrial stormwater runoff from external tank farm diked area (outside the berm) and truck and rail transfers (estimated flow is intermittent)

Outfall 005 – uncontaminated industrial stormwater runoff from interior of tank farm diked area (inside the berm) (estimated flow is intermittent)

Pollutant	Benchmark Monitoring Cutoff Concentration	Numeric Limitation ¹
TOC	---	50 mg/L
TSS	100 mg/L	---
Oil & Grease	---	15 mg/L

¹The discharge from this permitted outfall shall not exceed a Daily Maximum of 50 mg/L Total Organic Carbon (TOC) or 15 mg/L Oil and Grease. Analytical sampling and analysis of these parameters on a regular basis is not required. However, non-analytical monitoring of each outfall subject to this sector such as quarterly visual examination shall be conducted in accordance with Part 5 of this permit.

The MSGP required the preparation and implementation of a SWPPP prior to submittal of the NOI.

LAG670094

Outfall 006 - Hydrostatic Test Water

Pollutant	Daily Maximum	Frequency
Flow	Report	once prior to discharge
TSS	90 mg/L	once prior to discharge
TOC	50 mg/L	once prior to discharge
Oil & Grease	15 mg/L	once prior to discharge
Benzene	50 µg/l	once prior to discharge
Total BTEX	250 µg/l	once prior to discharge
Lead	50 µg/l	once prior to discharge
pH Min/Max Values	6.0 (min) 9.0 (max)	once prior to discharge

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040404 of the Lake Pontchartrain Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

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10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for IMTT-Geismar

Upon commencement of operations in Outfall 001 drainage area

1. **Outfall 001** – uncontaminated industrial stormwater runoff from rail car storage area, truck and rail transfers, and storage tank area (estimated flow is intermittent)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow (gpd)	Report	Report	*; BPJ
TOC	---	50	*; BPJ
Oil & Grease	---	15	*; BPJ
pH standard Units	6.0 (min)	9.0 (max)	*; BPJ

Treatment: none

Monitoring Frequency: 1/quarter from the Outfall 001 drainage area prior to mixing with waters of the state

Limits Justification: LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

Upon commencement of operations in Outfall 002 drainage area

1. **Outfall 002** – uncontaminated industrial stormwater runoff from rail car storage area, trucking scale, truck and rail transfers, and storage tank area (estimated flow is intermittent)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow (gpd)	Report	Report	*; BPJ
TOC	---	50	*; BPJ
Oil & Grease	---	15	*; BPJ
pH standard Units	6.0 (min)	9.0 (max)	*; BPJ

Treatment: none

Monitoring Frequency: 1/quarter from Outfall 002 the drainage area prior to mixing with waters of the state

Limits Justification: LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

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From the effective date of the permit to the expiration date of the permit

1. **Outfall 003** – uncontaminated industrial stormwater runoff from external tank farm diked area (outside the berm) and truck and rail transfers (estimated flow is intermittent)
Outfall 004 – uncontaminated industrial stormwater runoff from external tank farm diked area (outside the berm) and truck and rail transfers (estimated flow is intermittent)
Outfall 005 – uncontaminated industrial stormwater runoff from interior of tank farm diked area (inside the berm) (estimated flow is intermittent)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow (gpd)	Report	Report	*; BPJ
TOC	---	50	*; BPJ
Oil & Grease	---	15	*; BPJ
pH standard Units	6.0 (min)	9.0 (max)	*; BPJ

Treatment: none

Monitoring Frequency: 1/quarter from Outfall 003 drainage area prior to mixing with waters of the state; 1/quarter from Outfall 004 drainage area prior to mixing with waters of the state; 1/quarter from Outfall 005 drainage area prior to mixing with waters of the state

Limits Justification: LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

2. **Outfall 006** - hydrostatic test water (estimated flow is intermittent)

Pollutant	Limitation		Reference
	Monthly Avg ¹	Daily Max ²	
	mg/L		
Flow (gpd)	Report	Report:	Similar discharges* (BPJ), LAG670000
TOC	---	50	Similar discharges* (BPJ), LAG670000
Oil & Grease	---	15	Similar discharges* (BPJ), LAG670000
TSS	---	90	Similar discharges* (BPJ), LAG670000
Benzene	---	50 µg/l	Similar discharges* (BPJ), LAG670000
Total BTEX	---	250 µg/l	Similar discharges* (BPJ), LAG670000
Total Lead	---	50 µg/l	Similar discharges* (BPJ), LAG670000
pH standard Units	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG670000

Treatment: none

Monitoring Frequency: 1/event from each tank or vessel being tested. TOC shall be measured on discharges from facilities which have previously been in service; Benzene, Total BTEX, and Total Lead shall be measured on discharges from pipelines or vessels which have been used for the storage or transportation of liquid or gaseous petroleum hydrocarbons; and Flow, TSS, Oil and Grease, and pH are the only testing requirements for new pipe or vessels.

¹The month with the highest monthly average flow shall be reported.

²The highest result from an individual hydrostatic test must be reported.

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Limits Justification: Limits and monitoring frequency are based on the similar discharges from other industrial facilities and the Hydrostatic Test General Permit (LAG670000).

3. **Outfall 007** – exterior equipment and vehicle washwater without soaps or detergents (estimated flow is intermittent)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	---	Report	
COD	200	300	Similar discharges* (BPJ), LAG480000
TSS	---	45	Similar discharges* (BPJ), LAG480000
Oil & Grease	---	15	Similar discharges* (BPJ), LAG480000
Oil & Grease, Visual	---	No Presence	Similar discharges* (BPJ), LAG480000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG480000

Treatment: none

Monitoring Frequency: 1/day for oil and grease, visual and 1/quarter for flow, TSS, COD, oil and grease, and pH at the point of discharge from the washing activity prior to mixing with waters of the state.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

4. **Outfall 008** – exterior equipment and vehicle washwater with soaps and detergents (estimated flow is intermittent)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	---	Report	
COD	200	300	Similar discharges* (BPJ), LAG480000
TSS	---	45	Similar discharges* (BPJ), LAG480000
Oil & Grease	---	15	Similar discharges* (BPJ), LAG480000
Soaps & Detergents	Inventory Record	---	Similar discharges* (BPJ), LAG480000
Oil & Grease, Visual	---	No Presence	Similar discharges* (BPJ), LAG480000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG480000

Treatment: none

Monitoring Frequency: 1/day for oil and grease, visual and 1/quarter for flow, TSS, COD, oil and grease, and pH at the point of discharge from the washing activity prior to mixing with waters of the state. Soaps and Detergents: document in an inventory record 1/quarter the quantity and type of any Soap and/or Detergent used during each calendar month.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

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* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

NOTE: All potentially contaminated and contact industrial stormwater runoff, hydrostatic test water, and equipment and vehicle washwater will be sent to BASF for treatment and will discharge through their permitted outfall to the Mississippi River or will be sent to other permitted treatment and disposal facilities.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 4226 are not considered to have storm water discharges associated with industrial activity unless they have "vehicle maintenance shops, equipment cleaning operations, or airport deicing operations." This facility does have equipment cleaning operations.

The SWP3 shall be updated, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see narrative requirements for the AI).